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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALEXANDRA BALLEZA  
KNEELAND - ANDREWS,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:23-cv-00725-BNW

UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO RESPOND TO PLAINTIFF'S  
MOTION TO REMAND (FIRST REQUEST)

Defendant Andrew Saul, Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file his response to Plaintiff's Motion to Remand due on September 28, 2023 by 30 days, through and including October 27, 2023.

Defendant respectfully requests this additional time because the parties are discussing potential settlement, and need more time to determine whether additional briefing is necessary. This request is made in good faith with no intention to unduly delay the proceedings.

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1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
2 motion, on September 28, 2023.

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5 Dated: September 28, 2023

6 Respectfully submitted

7 JASON M. FRIERSON  
8 United States Attorney

9 /s/ Marcelo Illarmo  
10 MARCELO ILLARMO  
11 Special Assistant United States Attorney

12 IT IS SO ORDERED:

13   
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: 09/29/2023  
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**CERTIFICATE OF SERVICE**

I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the foregoing document on the date, and via the method of service, identified below:

**CM/ECF:**

Marc V Kalagian marc.kalagian@rksslaw.com

Attorney for Plaintiff

Dated September 28, 2023

/s/ Marcelo Illarmo  
**MARCELO ILLARMO**  
Special Assistant United States Attorney